

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**NO. 19-CR-3113-JB**

**ROBERT PADILLA, a.k.a. "Fat Head,"  
ROSE ANN ROMERO,  
JOHNATHAN VIGIL, a.k.a. "Lil John,"  
ROBERT HOCKMAN, a.k.a. "Tony,"  
MARCOS RUIZ, a.k.a. "Mark,"  
LUIS SANCHEZ, a.k.a. "Payaso,"  
ASHLEY ROMERO,  
TOMAS SANCHEZ, a.k.a. "T.J.,"  
AMANDA SILVA,  
SERGIO VALDEZ,  
GENEVIVE ATENCIO, and  
JANAYA ATENCIO,**

**Defendants.**

**MOTION FOR EXTENSION OF TIME TO FILE TITLE III DISCOVERY MOTIONS  
AND TO CONTINUE MOTION HEARING**

Defendant Rose Ann Romero, by and through Counsel of record, Ahmad Assed, Esq., hereby respectfully moves the Court to extend the deadline to file Title III discovery motions to March 4, 2021, and extend related response and reply deadlines accordingly, and to continue the hearing currently scheduled for March 4, 2021 for Pretrial Motions and Title III Discovery Motions by thirty (30) days. In support thereof, Ms. Romero states:

1. On February 1, 2021, the Court issued an order extending the time for filing Title III discovery motions to February 4, 2021, with responses due by February 18, 2021, and replies due by March 2, 2021; and also scheduling a hearing on any Title III discovery motions for March 4, 2021 at 9:00 A.M. (Doc. 328).

2. Disclosure of evidence to date consists of close to one terabyte of information. Counsel for the defense and his expert have been diligently reviewing the voluminous information for the purpose of identifying such evidence and determining the need for further disclosures which would be addressed through a Title III discovery motion. Counsel for the defense and his expert need an additional thirty (30) days to complete review of Title III related evidence in this matter.

3. Counsel for the defense continues to be restricted in their ability to conduct face-to-face meetings with clients to review and discuss discovery because of the restrictions still in place as a result of the COVID-19 pandemic. As such, counsel has been delayed in the ability to obtain client input related to the Title III evidence.

4. Extending the Title III discovery motions deadline to March 5, 2021 for filing of such motions; to March 19, 2021 for responses; and to April 2, 2021 for replies would require a continuation of the hearing currently scheduled for March 4, 2021. Counsel requests the hearing be continued to a date after April 2, 2021 to be determined by the Court.

5. Counsel for Defendant Rose Ann Romero has contacted counsel for co-Defendants for their position on this motion.

6. Co-Defendants Tomas Sanchez and Genevive Atencio join in this Motion; co-Defendant Jonathan Vigil takes no position on this Motion. Counsel has not yet received a response from the counsel for the remaining co-Defendants.

7. Counsel for Defendant has contacted AUSA Elaine Ramirez and the Government does not oppose this Motion.

**WHEREFORE**, Rose Ann Romero respectfully requests that the Court extend the deadlines for filing Title III discovery motions, responses and replies as requested above and continue the Motions Hearing currently scheduled for March 4, 2021 accordingly to a date to be determined by the Court.

Respectfully Submitted,

/s/ Ahmad Assed

**Ahmad Assed, Esq.**

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*Attorney for Rose Ann Romero*

I HEREBY CERTIFY that a true and correct copy of the foregoing was delivered electronically to parties of record, via the CM/ECF system, on this 3<sup>rd</sup> day of February, 2021.

/s/ Ahmad Assed

Ahmad Assed, Esq.

Attorney at Law